

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>EZENWA UGOCHUKU CHUKUKERE,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a Ugo Chukukere,</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy - 1 count)</b>
<b>OLAKUNLE ANTHONY ODERINDE,</b>	<b>:</b>	<b>18 U.S.C. § 1029(a)(2), 1029(b)(1)</b>
<b>a/k/a Tony Oderinde</b>	<b>:</b>	<b>(access device fraud - 1 count)</b>
		<b>18 U.S.C. § 2 (aiding and abetting)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From in or about November 2004, to on or about May 11, 2005, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**EZENWA UGOCHUKU CHUKUKERE,  
a/k/a Ugo Chukukere, and  
OLAKUNLE ANTHONY ODERINDE,  
a/k/a Tony Oderinde,**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly and with intent to defraud, traffic in and use one or more unauthorized access devices during a one-year period to obtain things of value aggregating \$1,000 or more, in violation of Title 18, United States Code, Section 1029(a)(2).

## **MANNER AND MEANS**

It was part of the conspiracy that:

2. Defendant EZENWA UGOCHUKU CHUKUKERE obtained unauthorized credit card and bank account information and provided the information to defendant OLAKUNLE ANTHONY ODERINDE.

3. Defendant OLAKUNLE ANTHONY ODERINDE encoded the unauthorized credit card and bank account information onto cards with magnetic strips.

4. At the direction of defendant EZENWA UGOCHUKU CHUKUKERE, defendant OLAKUNLE ANTHONY ODERINDE used the cards with the unauthorized account information to purchase Postal money orders and to make cash withdrawals from automated teller machines ("ATMs").

5. At the direction of defendant EZENWA UGOCHUKU CHUKUKERE, defendant OLAKUNLE ANTHONY ODERINDE sent a portion of the money obtained from the use of the unauthorized account information to defendant CHUKUKERE, and kept a percentage of the money for himself.

## **OVERT ACTS**

In furtherance of the conspiracy, defendants EZENWA UGOCHUKU CHUKUKERE and OLAKUNLE ANTHONY ODERINDE, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about May 7, 2005, defendant OLAKUNLE ANTHONY ODERINDE received from defendant EZENWA UGOCHUKU CHUKUKERE unauthorized

account information for Account No. xxxx2877 in the name of G.B., at Robins Federal Credit Union, in Warner Robins, Georgia.

2. In or about May 2005, defendant OLAKUNLE ANTHONY ODERINDE unlawfully encoded the account information of G.B. on the magnetic strip of cards.

3. From on or about May 8, 2005 to on or about May 11, 2005, defendant OLAKUNLE ANTHONY ODERINDE and others known and unknown to the grand jury used the cards with the unauthorized account information of G.B. to make cash withdrawals from ATMs in Philadelphia.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

From in or about November 2004, through on or about May 19, 2005, in Philadelphia in the Eastern District of Pennsylvania, and elsewhere, defendants

**EZENWA UGOCHUKU CHUKUKERE,  
a/k/a Ugo Chukukere, and  
OLAKUNLE ANTHONY ODERINDE,  
a/k/a Tony Oderinde,**

knowingly and with intent to defraud, trafficked in, used and attempted to use, and aided and abetted and willfully caused the trafficking in, use of and attempted use of, one or more unauthorized access devices, that is, Robins Federal Credit Union Account Number xxxx2877 in the name of G.B., and other credit card account and bank account numbers, to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of over \$2 million, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1), and

2.

## **NOTICE OF FORFEITURE**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Section 1029(a)(2), 1029(b)(1), as set forth in Count Two of this indictment, defendants

**EZENWA UGOCHUKU CHUKUKERE,  
a/k/a Ugo Chukukere, and  
OLAKUNLE ANTHONY ODERINDE,  
a/k/a Tony Oderinde,**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any and all property, real and personal, constituting and derived from proceeds obtained directly or indirectly as a result of such violations.

2. If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without

difficulty, it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), incorporating Title 21, United States Code § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)(B).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
**UNITED STATES ATTORNEY**